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Attorneys for Defendants,
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JUSTICE

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JEFFREY AMADOR, VERONICA
BENNETT, individually and as
successors-in-interest to Connor
Amador, deceased,

Plaintiffs,

vs.

CITY OF LOMPOC; ALEXANDER
JUSTICE; DOES 1-10, inclusive,

Defendants.

Case No. 2:25-cv-00167-FMO-SSC

**STIPULATION AND JOINT
REQUEST FOR CONTINUANCE
OF APRIL 10, 2025 MANDATORY
SCHEDULING CONFERENCE TO
May 22, 2025 AND ALL
ASSOCIATED DEADLINES**

Judge: Hon. Fernando M. Olguin

Complaint Filed: 01/07/2025

Trial Date: None Set

TO THE HONORABLE COURT:

By and through their counsel of record in this action, Plaintiffs JEFFREY AMADOR and VERONICA BENNETT (“Plaintiffs”) and Defendants CITY OF LOMPOC and OFFICER ALEXANDER JUSTICE (“Defendants”) (collectively the “Parties”) hereby stipulate to and jointly request that the Scheduling Conference in this matter, scheduled for April 10, 2025 at 10:00 a.m., be continued to May 22, 2025 at 10:00 a.m. and state as follows:

GOOD CAUSE STATEMENT.

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2 1. This cases arises from a December 29, 2023 officer involved shooting
3 incident involving decedent Connor Amador and Defendants The City of Lompoc
4 and Officer Alexander Justice. [See generally Dkt. 1.] Plaintiffs now bring causes
5 of action under 42 U.S.C. § 1983 for (1)Unlawful Detention; (2) Unlawful Arrest;
6 (3) Excessive Force; (4) Denial of Medical Care; (5) Deprivation of Familial
7 Relations; (6) Battery; (7) Negligence; and (8) a Bane Act Claim. [*Id.*]

8 2. On January 7, 2025, Plaintiffs filed their Complaint. [*Id.*] On March 3,
9 2025, after proper service of the Complaint, Defendants The City of Lompoc and
10 Officer Alexander Justice filed their Answer. [Dkt. 14.]

11 3. On March 5, 2025, the Court scheduled the Scheduling Conference for
12 April 10, 2025 at 10:00 a.m. [Dkt. 15.] Per this Court’s Order, “Lead trial counsel
13 must attend the scheduling conference, unless excused by the court for good cause
14 shown in advance of the scheduling conference...The court may choose to postpone
15 the scheduling conference rather than to permit counsel other than lead counsel to
16 attend.” [*Id.* at 1:26-2:3.]

17 4. There is good cause to continue the April 10, 2025 Scheduling
18 Conference as all counsel for Defendants will be engaged in a jury trial from April
19 8, 2025 through April 18, 2025 in the matter of *Helen Abascal v. County of Los*
20 *Angeles, et al.* (Case No. 2:23-cv-05246-HDV-JC), in front of the Honorable Judge
21 Hernan D. Vera. While Plaintiffs and their counsel do not have personal knowledge
22 as to defense counsels’ calendar and this unreconcilable conflict, Plaintiffs agrees
23 that a continuance is warranted so that lead trial counsel may attend the Scheduling
24 Conference and it will be as productive as possible.

25 5. In light of Defendants’ unavoidable trial conflict, the Parties hereby
26 jointly request that the Court continue the Scheduling Conference **to May 22, 2025**
27 **at 10:00 a.m.**, or some other, later, date that is more convenient to the Court’s
28 schedule.

1 6. With this short continuance, the Parties can hold their Rule 26(f)
2 Conference and file their Joint Schedule Report accordingly, which will allow for
3 the Scheduling Conference in this matter to be engaged in good faith and ensure
4 productivity for both the Parties and this Court.

5 7. This is the first request for any continuance of the Scheduling
6 Conference.

7 8. Accordingly, in light of the foregoing, and in order to facilitate the
8 interests of all parties to this action, by and through their counsel of record in this
9 action, the parties hereby Stipulate that **Good Cause exists** for the continuance
10 requested herein.

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STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE.

9. In light of the foregoing Good Cause, the Parties respectfully request that the Court continue the **Mandatory Scheduling Conference** in this matter to **May 22, 2025 at 10:00 a.m.**

10. All deadlines, including the deadline for the Parties' Rule 26(f) Conference and the filing of the Joint Schedule Report, will be based on this new Mandatory Scheduling Conference date.

11. This Stipulation may be signed in counterpart, and a facsimile or electronic signature shall be valid as an original signature.

IT IS SO STIPULATED.

DATED: March 11, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: Tori L.N. Bakken
TONY M. SAIN
TORI L.N. BAKKEN
Attorneys for Defendants,
CITY OF LOMPOC and ALEXANDER
JUSTICE

DATED: March 11, 2025

LAW OFFICES OF DALE K. GALIPO

By: Hang D. Le
DALE K. GALIPO
HANG D. LE
Attorneys for Plaintiffs,
JEFFREY AMADOR and VERONICA
BENNETT

FEDERAL COURT PROOF OF SERVICE

Jeffrey Amador, et al v. City of Lompoc, et al.

Case No. 2:25-cv-00167-FMO-SSC

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On March 11, 2025, I served the following document(s): **STIPULATION AND JOINT REQUEST FOR CONTINUANCE OF APRIL 10, 2025 MANDATORY SCHEDULING CONFERENCE TO MAY 22, 2025 AND ALL ASSOCIATED DEADLINES**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Law Officers of Dale K. Galipo
Dale K. Galipo (Bar No. 144074)
dalekgalipo@yahoo.com
21800 Burbank Blvd., Suite 310
Woodland Hills, CA 91367
T: (818) 347-3333

ATTORNEY FOR PLAINTIFFS

The documents were served by the following means:

☒ (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on March 11, 2025, at Los Angeles, California.

/s/ Curfew F. Wilson

Curfew F. Wilson